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13
 14 **IN THE UNITED STATES DISTRICT COURT**
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,
 17 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

18 This Document Relates to:

STIPULATION REGARDING CERTAIN
 DOCUMENTS

19 ALL WAVE 1 BELLWETHER CASES

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 22 Judge: Hon. Charles R. Breyer
 23 Courtroom: Courtroom 6-17th Floor

24 WHEREAS, on August 21, 2025, the MDL Plaintiffs deposed corporate representative Chad
 25 Dobbs on six specific deposition topics:

Topic Number	Deposition Topic
1	Your strategy to increase the number of Riders and Rides for 2018 to present.
2	Your reasoning and basis for using an independent contractor model and

Topic Number	Deposition Topic
	how use of that model affected sexual assault prevention.
3	All means You employ to incentivize Drivers, including incentives for Drivers to increase the total number of hours they drive, the times at which they drive, and the locations where they pick up Riders.
4	All means You employ to incentivize Your employees, managers, and agents to increase or maintain driver supply and/or driver supply hours, including but not limited to KPIs or similar metrics, compensation, incentive programs, quotas, rewards and equity.
5	All means You employ to incentivize Your employees, managers, and agents to increase or maintain driver supply and/or driver supply hours available during nights and weekends, including but not limited to KPIs or similar metrics, compensation, incentive programs, quotas, rewards and equity.
8	Uber's policies, practices, and procedures for recruiting Drivers in each of the Bellwether Regions. As part of this topic, the deponent(s) should be prepared to discuss: (a) incentives, campaigns, policies, or directives related to Driver recruitment in the two years prior to each time the Subject Drivers applied to drive with Uber; (b) incentives, campaigns, policies, or directives related to Driver Supply in the two years prior to each time the Subject Drivers applied to drive with Uber; (c) campaigns or Marketing targeted at the Bellwether Regions in the two years prior to each time the Subject Drivers applied to drive with Uber; (d) Uber's target quantity of Drivers for the Bellwether Regions in the two years prior to each time the Subject Drivers applied to drive with Uber.

WHEREAS, after more than seven hours of time on the record with the witness, the Parties disagreed as to whether any additional time remained with the witness or whether time had run out;

WHEREAS, in an effort to avoid burdening the Court with this dispute, counsel agreed to meet and confer in an attempt to reach a Stipulation regarding the set of 18 documents not used during the deposition that counsel represented would be used with the witness absent the parties' dispute about time;

THEREFORE, as a result of these meet and confer efforts, Uber and Plaintiffs stipulate that 18 documents listed below are authentic, true, and correct records kept in Uber's ordinary course of business. The parties further stipulate that Plaintiffs' experts can consider these documents for their expert opinions, and that Uber will not object to the admission of these documents at trial on the ground that they were not put into evidence through a fact witness or 30(b)(6)

witness. Notwithstanding this Stipulation, Uber reserves all rights to object to the use of these documents at trial on all *other* grounds including but not limited to grounds of relevance and prejudice.

DOCUMENTS SUBJECT TO THIS STIPULATION:

<u>Document Number</u>	<u>Bates Number</u>
1	UBER_JCCP_MDL_001534042
2	UBER_JCCP_MDL_002331333
3	UBER_JCCP_MDL_001534664
4	UBER_JCCP_MDL_005052169
5	UBER_JCCP_MDL_001144266
6	UBER_JCCP_MDL_002063303
7	UBER_JCCP_MDL_002315575
8	UBER_JCCP_MDL_005613067
9	UBER_JCCP_MDL_002315434
10	UBER_JCCP_MDL_002315507
11	UBER_JCCP_MDL_001641347
12	UBER_JCCP_MDL_002394360
13	UBER_JCCP_MDL_003732126
14	UBER_JCCP_MDL_005020883
15	UBER_JCCP_MDL_003768669
16	UBER_JCCP_MDL_002416773
17	UBER_JCCP_MDL_002252092
18	UBER_JCCP_MDL_005534201

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3 **IT IS SO STIPULATED.**
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5 DATED: December 13, 2025

Respectfully submitted,

6 By: /s/ Rachel Abrams
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24 Dated: December 13, 2025

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Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 13, 2025

/s/ Alexandra Walsh

Alexandra Walsh

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: _____

United States District Judge

Honorable Charles R. Breyer